

UNITED STATES DISTRICT COURT  
FOR SOUTHERN DISTRICT OF ALABAMA

UNITED STATES OF AMERICA                  )  
  )  
  )  
vs.    )      Case 1:12-cr-00215-001-WS  
  )  
JOHN ROBERT MCGHEE                        )

DEFENDANT'S SENTENCING MEMORANDUM

John Robert McGhee is scheduled to be sentenced in this Court pursuant to his plea of guilty in this case on May 9, 2013.

Through counsel, Mr. McGhee wishes to family and friends' letters and other materials for the Court's consideration in conjunction with that sentencing.

John McGhee is married, has four children, two fraternal twins, Drew and Destiny (about to graduate from high school this month), two grandchildren and has had a happy marriage and home life, contributing to his community and Church.

For instance, his wife, Karoncia Hall-McGhee, states in her letter:

"I want the court to know (the defendant) as I know him and Not only as a defendant in a criminal matter. I have known him since January 1991. Since then he has shown himself to be a caring man, good provider, awesome father to our children and a well respected man. John has a very generous and giving spirit and is always helping his family and friends in any capacity . . ."

His son, Drew McGhee, states:

" . . . I'm the youngest of his children and my father is the only individual I can go to for advice and guidance. John McGhee

is the best father and grandfather a person can have. . . My father is a great leader and has made a large contribution and impact on everyone's life. Everything my father does, he do it to help someone less fortunate than himself or his family. He also helps me on important decisions that could change my life. . . “

Jean Hall, a family friend, writes to the Court:

“. . . I have known John for over twenty years as I was married to his father-in-law. My experiences with John have always been pleasant. . . John is a good person, who is committed to his wife, Karoncia and their four children. He has been instrumental in Karoncia's personal and career growth. He is very much active in his children's education as well as their career path. . . He is very supportive of others. In fact, John was very supportive to my own son during a stressful time in his life. . .”

Mr. McGhee's father-in-law, Kenneth Hall, states:

“. . . I have known John since 1991, and I have always known him to be a hard working family man. . . John is truly a devoted husband and father. . . John treats me with the utmost respect, in which I could not have asked for a better son-in-law. . . I do not know the specifics about his case; however, I do know that he is a hard working, caring family man. His absence from his family and friends would be greatly missed. . . “

Jewel McKee, the mother of his two grandsons, writes to the Court:

“. . . I have known Mr. McGhee since I was 14 years old; now I am 25 years old. . . Growing up I had no father, but at the age of 13, Mr. McGhee took me in and became a father figure, which is something I never had. Also, your Honor, when I had nowhere to go, he cared for me, sheltered me and my kids. He also still supports us financially when we needed help. . .”

One of Mr. McGhee's close friends, Lucious Lackley, III, states in his letter:

“. . . We have become good friends through the many family barbecues and children birthdays. John has helped me several

times by working on my cars and trucks when I was down financially. He is a great person especially when it comes down to being a role model for his kids and others in the community. He has attended most of all my wife's community volunteer projects for less fortunate children . . .”

Mr. Lackley's wife, Terese Lackley, states:

“ . . . John is a great father. He has always attended family functions that his wife and I put together for our families. I have never known him not to spend quality time with family and friends. He has always helped me with volunteer work with the students I service in the Vine City neighborhood and has always been a positive role model for our young male students. I believe John McGhee has a lot to contribute to our youth in our community.”

As these letters indicate, Mr. McGhee has not only been a quality father, but has also served his community and been active in volunteer community projects.

For instance, in the letter from the City of Union City, Georgia, it states:

“John McGhee has been a contributor of the South Fulton Miracle League since its inception. South Fulton Miracle League has been reaching out to severely disabled children since 2005 and provides these children with a sense of normalcy in a already challenging life. . . Without Mr. McGhee's contribution, the Miracle League could not Function to its current capacity.”

The secretary of a Church Mr. McGhee is closely affiliated with, Twana E. Hall, offered her letter in support of Mr. McGhee and states:

“I have known John McGhee since 1992. During the years that I have known John, he has volunteered his time to assist us with various tasks around the church. During one of his visits to Tallahassee, our church was doing renovation work and John volunteered to come and assist us with painting and moving furniture. . . He is always been the type of person to lend a

helping hand to those in need."

The Pastor of his own Church, Samuel E. Christian, ThD, writes:

"... I have personally known Mr. McGhee for more than ten years and consider him a treasured friend of the family. I have observed him for myself as being a very courteous, professional, and hard-working entrepreneur. My family and I have also known him to be a devoted family man that loves his wife and children, and has been resolute in providing for them..."

Also included with this memorandum are photographs of Mr. McGhee with his wife and family. There are those who genuinely and greatly care about him.

Further, he has in the past, had very successful and LEGAL business endeavors, including a mobile dry cleaning service for six years. He has bought and sold automobiles and has worked as a vehicle inspector for an automobile company in Stockbridge, Georgia.

Mr. McGhee has an elderly, disabled mother, who is dependent upon him for all her support and caretaking.

Mr. McGhee came into the Court voluntarily and pled to an Information in this case. He gave a full and complete, truthful proffer to the Assistant United States Attorney's office. Other matters will be addressed at the sentencing that occurred during the pendency of this case, but it will still be demonstrated that John McGhee has redeeming qualities and a desire to lead a law-abiding life and take care of his family.

Respectfully Submitted,

S / Jana Lauren Harris  
JANA LAUREN HARRIS  
Georgia Bar No. 330275  
Counsel for John R. McGhee

JANA HARRIS LAW, LLC  
3151 Maple Drive, N.E.  
Atlanta, GA 30305

March 18, 2013

To: Honorable Judge William H. Steele

From: Karoncia Hall-McGhee

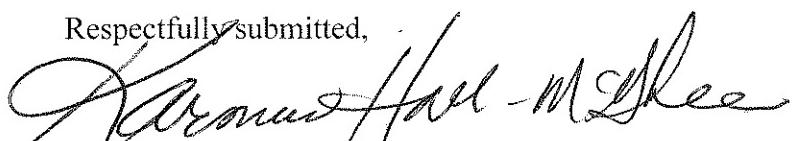
Dear Honorable Judge Steele,

I'm writing today in regards to my husband John McGhee. I want the court to know the defendant as I know him and not only as a defendant in a criminal matter. I have known him since January 1991. Since then he has shown himself to be a caring man, good provider, awesome father to our children and a well respected man. John has a very generous and giving spirit and is always helping his family and friends in any capacity. My husband is not perfect and has made some mistakes but he is not the person that the Prosecutors have described. I understand that justice must be served and punishment must be dispensed. However Your Honor, I ask that you extend grace and mercy towards my husband when sentencing him. My children and I love and need him and your decision will greatly affect our entire family.

Again, Honorable Judge Steele I am respectfully, pleading for the mercy of this court when sentencing my husband and the father of my children, John McGhee.

Thank you in advance for your time and consideration.

Respectfully submitted,



Karoncia Hall-McGhee

April 14, 2013

The Honorable William Steele

Chief U.S. District Judge  
William H. Steele  
Southern District of Alabama  
113 Joseph Street  
Mobile, AL 36602

Dear Honorable Judge Steele:

John Robert McGhee, who is the father of 4 children, is a very dear person and beloved individual in his household and the community he serves in. I'm the youngest of his children and my father is the only individual I can look up to as a role model and the only individual I can go for advice and guidance. John McGhee is the best father and grandfather a person can have. My father has gone above and beyond to make sure I graduate from high school, make sure I eat every day, provides clothing and shelter, and make sure I don't make a bad decision that would destroy my life and most of all he cared for me and make sure I had the best opportunity to become successful in life.. My father is a great leader and has made a large contribution and impact on every one's life. Everything my father does, he do it to help someone less fortunate than himself or his family. He also helps me with important decisions that could change my life. I am in 12th grade and I am graduating on May 25, 2013. My father has to be there to watch me walk across the stage and receive my diploma and his guidance and wisdom helped and guided me through success and may be the only reason I graduated, which is one of the most important achievement in my life.

Sincerely,



Drew McGhee

March 22, 2013

Chief U.S. District Judge  
William H. Steele  
Southern District of Alabama  
113 Joseph Street  
Mobile, AL 36602

Dear Honorable Judge Steele:

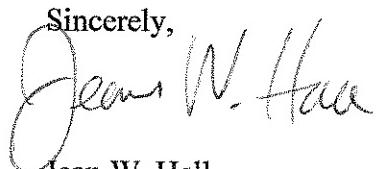
I am writing this letter in support of John McGhee, who is being tried for Rico Mail Fraud. I have known John for over twenty years as I was married to his father-in-law. My experiences with John have always been pleasant.

I want to share with the court what kind of person John is, despite of his alleged criminal case. John is a good person, who is committed to his wife, Karoncia and their four children. He has been instrumental in Karoncia's personal and career growth. He is very much active in his children's education as well as their career path. John has always provided for his family and loves them unconditionally. He is very supportive of others. In fact, John was very supportive to my son during a stressful time in his life. Further, I have observed him helping other with their chores. Although I am divorced from his father-in-law, he and his family continued to follow-up on my well-being.

I am aware that John has being charged for breaking the law; however, I am pleading to the court, if sentenced, please allow Mr. McGhee to serve his sentence in the community where he resides in Georgia and not in prison. I strongly believed that John is remorseful for his action and if given a second chance to be reunited back with his family, I feel he will set his life back on the right track. John McGhee is a good man!

Thank you for taking time to read this letter. Please kindly consider his situation, when making your decision. If you have any questions, please feel free to contact me at (850) 508-5223.

Sincerely,



Jean W. Hall  
Family Friend  
902 Kendall Drive  
Tallahassee, FL 32301

March 21, 2013

The Honorable Chief U.S. District Judge  
William H. Steele  
Southern District of Alabama  
113 Joseph Street  
Mobile, AL 36602

Dear Honorable Judge Steele:

I am writing this character letter on behalf of John McGhee. I am John's father-in-law. I have known John since 1991, and I have always known him to be a hard working family man.

I have been impressed with John since he entered into my daughter's, Karoncia, life. He has taken care of my daughter and my four grandchildren, Johntavius, Diamond, Drew and Destiny. John is truly a devoted husband and father. He has been the sole provider for his family in all aspects of live and supports them with tremendous care and love. John treats me with the utmost respect, in which I could not have asked for a better son-in-law. He is also respectable to friends and others.

I do not know the specific about his case; however, I do know that he is a hard working, caring family man. His absence from his family and friends would be greatly missed. It is with hope that John is ordered to remain in the community. I strongly feel that John would not disregard a promise or obligation and can be trusted to do the right thing.

Please consider all of these factors in making your decision.

Sincerely,

  
Kenneth Hall  
3225 Sandalwood Drive, North  
Tallahassee, FL 32305  
(850) 274-6512

April 22, 2013

Chief U.S. District Judge  
William H. Steele  
Southern District of Alabama  
113 Joseph Street  
Mobile, AL 36602

Dear Honorable Judge Steele:

I am writing on behalf of John McGhee. I'm the mother of his two grandsons (Jewel McKee). I have known Mr. McGhee since i was 14 years old, now. I am 25 years old. When sentencing Mr. McGhee, please lighten his sentence. I'm asking this not only for me, but for my boys (Mr. McGhee grandkids) and others. Growing up i had no father, but at the age of 14, Mr. McGhee took me in and became a father figure, which is something i never had. Also your honor, when i had nowhere to go he cared for me, sheltered me and the kids. He also still supported us financially when we needed help. He is definitely a great grandfather, and supports us. In saying all that your honor, we ask that you allow Mr. John a second chance and allow him to make his wrongs right. Please consider all he has done for not only his family, but for others like me. Thank for taking time to read this letter. If you have any questions, please free to contact at 404-963-6598.

Respectfully,



Jewel McKee

April 16, 2013

Lucious Lackley III  
65 Creek Stone Court  
Covington, Ga 30016

To Whom It May Concern;

I met John McGhee through my wife many years ago. We have become good friends through the many family barbeques and children birthdays. John has helped me several times by working on my cars and trucks when I was down financially. He is a great person especially when it comes down to being a role model for his kids and others in the community. He has attended almost all my wife's community volunteer projects for less fortunate children. He is a good person and friend to me and my family.

Sincerely,

  
Lucious Lackley III

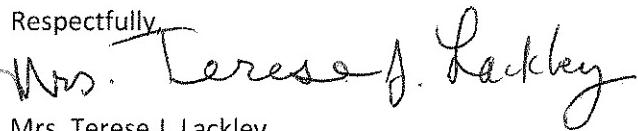
April 15, 2013

Terese J. Lackley  
65 Creek Stone Court  
Covington, Ga. 30016

Dear Honorable Judge Steele,

I am writing this letter on behalf of the McGhee family. I have known John McGhee the latter part of my high school years and then met his wife whom I worked with for several years. John has served my mother and me when he had the cleaning business and our families are good friends. We have always associated in the same circle of friends. John is a great father he has always attended family functions that his wife and I put together for our families. I have never known him not to spend quality time with family and friends. He has always helped me with volunteer work with the students I serve in the Vine City neighborhood and has always been a positive role model for our young male students. I believe John McGhee has a lot to contribute to our youth in our community.

Respectfully



Mrs. Terese J. Lackley



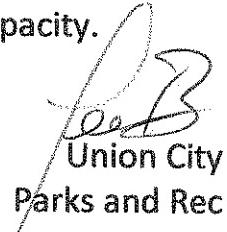
**CITY OF UNION CITY**

*"The Progressive City"*

5047 UNION STREET  
UNION CITY, GEORGIA 30291-1497  
PHONE 770/964-2288  
FAX 770/306-6861

To Whom It May Concern,

John McGee had been a contributor of the South Fulton Miracle League since its inception. South Fulton Miracle League has been reaching out to severely disabled children since 2005 and provides these children with a sense of normalcy in an already challenging life. The Miracle League is a fully functioning baseball team made-up of Fulton County's most vulnerable citizens. Without Mr. McGee's contribution the Miracle League could not function to its current capacity.

  
Lee B.  
Union City  
Parks and Rec

*"The Church of a New Generation"*

**SHILOH**  
APOSTOLIC FAITH CHURCH

Elder Edith W. Hall, Pastor

April 23, 2013

Chief US District Judge William H. Steele  
Southern District of Alabama  
113th St. Joseph Street  
Mobile, AL 36602

Dear Honorable Judge William H. Steele,

I have known John McGhee since 1992. During the years that I have known John , he has volunteered his time to assist us with various tasks around the church. During one of his visits to Tallahassee, our church was doing renovation work and John volunteered to come and assist us with painting and moving furniture.

I have known John to be an honest straight forward man. He is a very dedicated family man that loves and cares for his wife and children. He has always been the type of person to lend a helping hand to those in need.

Please feel free to contact me at (850) 545-5572 if I may be of further assistance.

Sincerely,

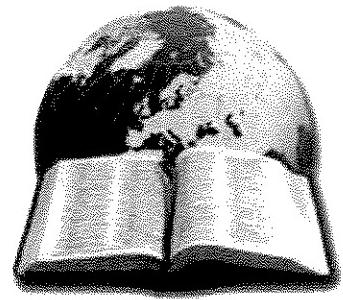
*Twana E. Hall*

Twana E. Hall  
Secretary

# The True Church of the Living Faith

*"Where Jesus is Lord"*

Drs. Samuel & Ruby Christian, Pastors



April 24, 2013

Chief US District Judge William. H. Steele  
Southern District of Alabama  
113 St. Joseph Street  
Mobile, Alabama 36602

**RE: Mr. John R. McGhee**

This letter is written as a character reference for Mr. John McGhee. My name is Samuel E. Christian. I am Senior Pastor of The True Church of the Living Faith, Inc. in Atlanta, Georgia.

Please let it be known that I have personally known Mr. McGhee for more than 10 (ten) years, and consider him a treasured friend of the family. I have observed him for myself as being a very courteous, professional, and hard-working entrepreneur. My family and I have also known him to be a devoted family man that loves his wife and children, and has been resolute in providing for them.

I understand that no one can know all there is to know about a person, but all that I have observed of Mr. McGhee has been above reproach. He has demonstrated to me and my family nothing short of a person of outstanding character and integrity.

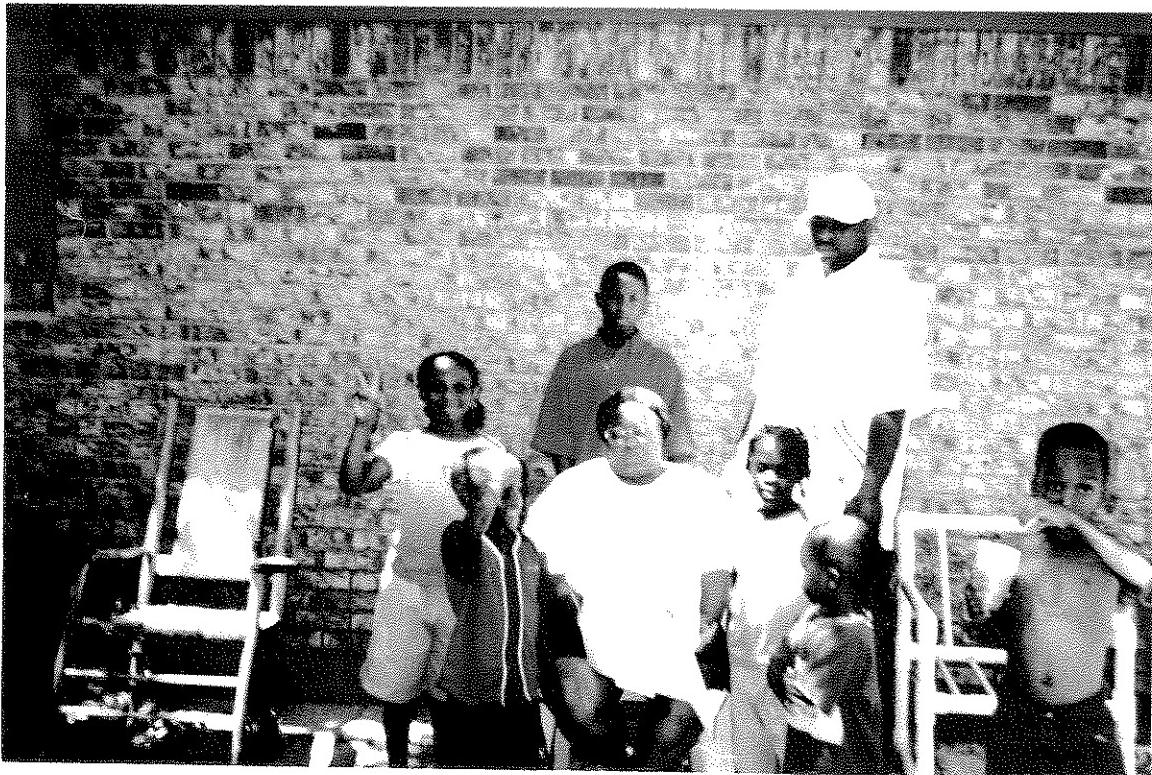
Please allow this letter to be considered and extend a level of mercy while your decision is being made concerning Mr. McGhee's fate. Thank you in advance for your positive consideration.

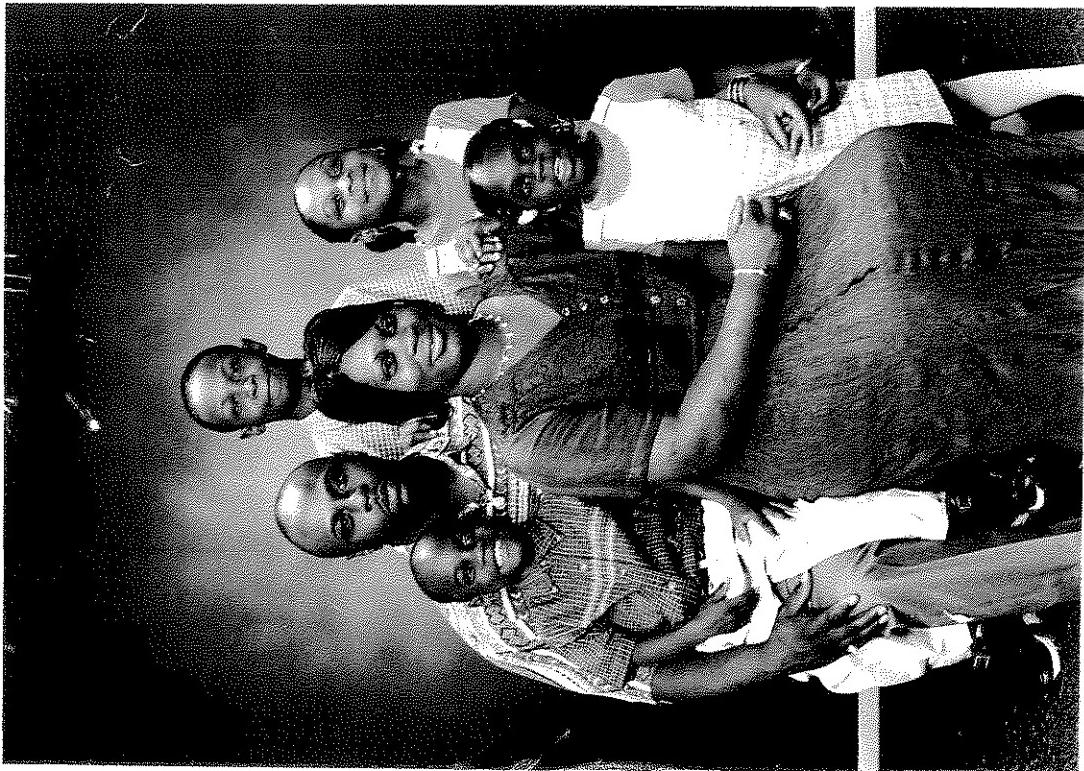
Respectfully,

A handwritten signature in black ink, appearing to read "Samuel E. Christian, ThD".

Samuel E. Christian, ThD







UNITED STATES DISTRICT COURT  
FOR SOUTHERN DISTRICT OF ALABAMA

UNITED STATES OF AMERICA                  )  
    )  
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vs.    )      Case 1:12-cr-00215-001-WS  
    )  
    )  
JOHN ROBERT MCGHEE                        )

**CERTIFICATE OF SERVICE**

This is to certify that I have on this the 26<sup>th</sup> day of April, 2013, served counsel for the opposing party with a copy of the within and foregoing DEFENDANT'S SENTENCING MEMORANDUM by electronic filing which will automatically deliver a copy of the pleading to every attorney of record.

*S / Jana Lauren Harris*  
JANA LAUREN HARRIS  
Georgia Bar No. 330275

JANA HARRIS LAW, LLC  
3151 Maple Drive, N.E.  
Atlanta, GA 30305